

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS M. COULD
CLERK, U.S. DISTRICT COURT
WD OF TN, MEMPHIS

ANTHONY HERRON

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

CCS Correct Care Solutions
Shelby County Department of Correction

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Anthony Herron
(name of plaintiff)

is a citizen of the United States and resides at 777 Mt. Moriah Rd, # 28
(street address)

Memphis Shelby TN
(city) (country) (state)

38117 901-574-9896
(zip code) (telephone number)

3. Defendant Correct Care Solutions / Shelby County Dept. of Corrections
 (defendant's name)

lives at, or its business is located at 3343 Perimeter Hill Drive Suite 300, Nashville TN
 (street address) 37211
Penal Farm (Jobsite) 1045 Mullins Station Rd Mem TN 38134

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1045 Mullins Station Rd
 (street address)
Memphis USA TN 38134
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 10th April 2010

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

2010 2011
 (day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 21 - July 2012. (Attach a copy of the notice to this complaint.)
 (day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☒ sex, (4) ☐ religion, (age)
 (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) retaliated against employee after he filed a complaint at corporate office about harassment and discrimination

10. The circumstances under which defendant discriminated against plaintiff were as follows: See enclosed / attached complaint

11. The acts set forth in paragraph 9 of this complaint

- (a) ____ are still being committed by defendant.
- (b) ____ are no longer being committed by defendant.
- (c) ____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ____ Defendant be directed to employ plaintiff, or
- (b) ____ Defendant be directed to re-employ plaintiff, or
- (c) ____ Defendant be directed to promote plaintiff, or;
- (d) ____ Defendant be directed to re-employ and compensate
employee for losses

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (✓) No ()

Anthony Henon
SIGNATURE OF PLAINTIFF